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March 14, 2025

VIA ECF

Hon. Jennifer H. Rearden
United States District Judge
United States District Court
Southern District of New York
500 Pearl Street, Room 1010
New York, NY 10007

3/15/2025

The joint request is granted. This order supersedes
Dkt. 86.

SO ORDERED.



Re: *Campbell et al. v. The City University of New York*, 1:24-cv-02575 (JHR) (RWL)

**Amended Joint Request for Conditional Certification of Two Collectives and
Approval of Proposed Notice**

Dear Judge Rearden:

On February 13, 2025, Plaintiffs filed an Amended Motion for Conditional Certification of Two Collectives (the “Motion”). *See* Dkt. 79-81. The Motion requested that Defendant be ordered to supply Plaintiffs’ counsel with contact information for all putative collective members within 14 days of Preliminary Approval. Dkt. 81 at 17. The Motion also proposed a Notice and a Reminder Notice to be sent to the purported collective members. Dkt. 80-17, 80-18.

After the Motion was filed, Defendant’s counsel indicated that Defendant would not oppose Plaintiffs’ motion if the parties could agree upon the terms of the Notice and Reminder Notice (the “Notices”). So, the parties engaged in good-faith negotiations regarding the language of the Notices and agreed upon the Notices attached to this letter motion as Exhibits 1 and 2. Defendant’s counsel also requested that Defendant have 30 days to provide the putative collective members’ contact information, instead of 14 days. Plaintiffs’ counsel consented to this request.

Accordingly, the parties jointly request that:

- The Court conditionally certifies the proposed collectives as defined in Docket 81 at 1, 2.
- The Court approve the proposed Notices, attached here as Exhibits 1 and 3. Redlines showing the differences from the previously submitted Notices are attached as Exhibits 2 and 4.

- The Court permit Plaintiffs' counsel to hire Settlement Services, Inc. ("SSI"), a third-party class action administration company, to mail and email the Notices and conduct skip traces if necessary. Plaintiffs' counsel will oversee and pay SSI's fees and costs, subject to reimbursement if Plaintiffs ultimately prevail.
- The Court order Defendant to provide Plaintiffs' counsel within 30 days of Preliminary Approval a computer-readable file with the following information for all putative collective members: names, last known mailing addresses, alternate addresses, all known email addresses (work and personal), and dates of employment for all putative collective members employed since three years before the date the Court grants this motion.
- In light of the case, *Calliste, et al v. CUNY*, Case No. 1:24-CV-04016 (JHR) (RWL), which has been consolidated with the *Campbell* case for discovery purposes only, all parties in both cases have agreed that the *Calliste* Plaintiffs are to be excluded from receiving the Notice to join the *Campbell* case. Therefore, Counsel for the *Calliste* Plaintiffs shall provide a list of *Calliste* Plaintiffs to Defense Counsel and *Campbell* Counsel within 5 business days of the Court's approval of the Notice. Defense Counsel shall exclude all *Calliste* Plaintiffs from the list of all putative collective members to be submitted to Campbell Counsel within 30 days of the Court's Preliminary Approval of the Notice and no contact information for the *Calliste* Plaintiffs shall be shared with *Campbell* Counsel nor with Settlement Services, Inc. ("SSI") in connection with mailing of the Notice.

Dated: Garden City, New York

March 14, 2025

Respectfully submitted,

/s/ Robert J. Valli, Jr.

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